

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MALEEEHA AHMAD )  
                      )  
and                  )  
                      )  
ALISON DREITH,     )  
                      )  
*on behalf of themselves and a class of*     )  
*similarly situated individuals,*     )     No. 4:17-cv-2455  
                      )  
Plaintiffs,        )  
                      )  
v.                  )  
                      )  
CITY OF ST. LOUIS, MISSOURI,     )  
                      )  
Defendant.        )

**DECLARATION OF MALEEEHA AHMAD**

I, Maleeha Ahmad, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. On September 15, 2017, I participated in a protest march following the acquittal of Officer Jason Stockley.
3. The march took place in downtown St. Louis.
4. That afternoon, I was standing on Tucker Boulevard between the cross streets Spruce and Clark.
5. The street had already been closed by the St. Louis Metropolitan police.
6. Behind me was a bus full of police. The bus faced toward the north.
7. A line of St. Louis Metropolitan police officers carrying bicycles in front of their bodies approached me from the north on Tucker.

**EXHIBIT B**

8. The line of police officers shouted “Get out of our way!” when they were about one foot away from me.

9. I did not say anything to them.

10. Without warning, an officer sprayed me with pepper spray directly in my face.

11. The lead officer used his bicycle to ram through me and the other pedestrians who had been standing there, and then the officers stormed through in a V-shape.

12. I was unarmed, not committing any damage to property, and posed no safety threat to any person.

13. The officer did not warn me that he was about to deploy a chemical agent against me.

14. Even though I was wearing a scarf and sunglasses, the pepper spray burned my eyes and my skin. Everything went black with pain.

15. Other protestors immediately came to my aid and helped me flush the spray. The bright sun exacerbated the pain tremendously. Since I could not see, other protestors helped me move to the shade.

16. The police did not provide me with any first aid.

17. I was not arrested.

18. Attached to this declaration is a photograph of me with residue on my skin.

19. I knew that the St. Louis Metropolitan police had previously deployed chemical agents without warning during nonviolent protests against police misconduct because I had been gassed near the intersection of Arsenal and Grand in late 2014.

20. That time, too, I had been unarmed and posed no threat to any person or property.

21. I learned that the St. Louis Metropolitan police had deployed chemical agents, including at least pepper spray, pepper balls, and tear gas, without warning at other times over the weekend of September 15, and that they had done so on previous occasions other than the time I had experienced it.

22. I learned that over the weekend of September 15, the St. Louis Metropolitan police interfered with, and targeted for arrest and abuse, people who were recording video of the police performing their duties.

23. I learned that the St. Louis Metropolitan police were arresting protestors and others for “failing to disperse” or for being part of an “unlawful assembly” in an arbitrary way and without giving warnings that I would be able to understand.

24. What I learned—plus what I experienced—made me frightened of arbitrary arrest by the St. Louis Metropolitan police, as well as abuse and retaliation for engaging in expressive activity that is critical of the police.

25. I have not participated in protests I would otherwise have participated in because I am afraid of what the police will do.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 26th day of September, 2017.

By: /s/ Maleeha Ahmad  
Maleeha Ahmad

